IN THE UNITED STATES DISTRICT COURT FOR THE DISTRICT OF MASSACHUSETTS

BIS ADVANCED SOFTWARE SYSTEMS, LTD.,)))
Plaintiff,)
v.	Civil Action No. 04-11960-RWZ
RED BEND SOFTWARE, INC., RED BEND SOFTWARE, LTD.,)
TIME WARNER INC., ICQ, INC.,)
INSTALLSHIELD SOFTWARE CORP.,)
and SCANSOFT, INC.)
Defendants.	,)

JOINT MOTION TO ENTER STIPULATED PROTECTIVE ORDER

The parties jointly request that the Court enter the Stipulated Protective Order, filed herewith, which shall be applicable to and govern any and all depositions, documents, and any other tangible things produced in response to requests for production thereof, answers to interrogatories, responses to requests for admissions, and all other discovery taken pursuant to the Federal Rules of Civil Procedure, as well as testimony adduced at trial, matters in evidence, and other information exchanged by the parties in the above-captioned action or produced by a third-party witness which is designated as confidential or highly confidential.

Respectfully submitted,

/s/ Scott McConchie

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Dated: May 19, 2005